

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

\_\_\_\_\_  
DENA FRIEDMAN,  
Plaintiff,

v.

\_\_\_\_\_  
INTERSYSTEMS CORPORATION,  
Defendant.  
\_\_\_\_\_

Civil Action No. 05-10738

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE**

Plaintiff Dena Friedman and Defendant InterSystems Corporation respectfully submit this joint motion to extend the discovery deadline from February 15, 2006 to April 3, 2006. As grounds for this Motion, the parties state that they have already taken the depositions of the Plaintiff and several of Defendant's employees, including Susan Ragon, Terry Ragon, and Jerry Grove, but have had to postpone depositions of several witnesses, including two third party witnesses, due to scheduling conflicts. The parties state that they will not be able to complete the necessary discovery prior to the current discovery deadline.

The parties also respectfully request that this Court extend the deadline for Plaintiff to designate expert witnesses and disclose expert reports until April 3, 2006, the deadline for Defendant to designate expert witnesses and disclose expert reports until May 3, 2006, the expert witness deposition deadline until June 19, 2006, the summary judgment deadline until July 19, 2006, and the deadline for oppositions to summary judgment until August 18, 2006. The parties further respectfully request that the Court reschedule the scheduling/status conference currently scheduled for July 18, 2006 at 2:30

p.m. until a later date that is convenient for the Court and set a commensurate deadline for the filing of Status Reports prior to the conference.

RESPECTFULLY SUBMITTED,

DENA FRIEDMAN  
By her attorney,

INTERSYSTEMS CORPORATION  
By its attorneys,

/s/ Timothy K. Cutler  
Timothy K. Cutler (BBO# 636124)  
CUTLER P.C.  
77 Franklin Street, Suite 200  
Boston, Massachusetts 02110  
(617) 338-8243

/s/ Maura J. Gerhart  
Liam T. O'Connell (BBO# 558429)  
Maura J. Gerhart (BBO# 654695)  
HOLLAND & KNIGHT LLP  
10 St. James Avenue  
Boston, Massachusetts 02116  
(617) 523-2700

Dated: February 7, 2006

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 7, 2006.

/s/ Maura J. Gerhart  
Maura J. Gerhart, Esq.

# 3527304\_v2